

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JAMES JULSONNET and DIANE JULSONNET
6111 Leon Young Drive, Colorado Springs,
Colorado 80924

Plaintiffs,

Civil Action No.1:22-CV-
10767

v.

TOPHILLS INC., (dba FIVE STAR MOVERS),
and
ENRIQUE A. ESCOBAR
89 Adams Street
Newton MA 02458

and

FEBEX MOVING & STORAGE (dba Interstate
Moving and Storage), and MIKHAIL
NARYSHKIN (aka JEFF ATWELL)
39899 Balentine Drive Suite 200, Newark CA
94560

Defendants.

**PLAINTIFFS' MOTION TO REISSUE SUMMONS EXTEND TIME FOR SERVICE ON
DEFENDANTS FEBEX MOVING & STORAGE AND MIKHAIL NARYSHKIN**

ASSENTED TO RELIEF

NOW COME the Plaintiffs, James and Diane Julsonnet, by and through their attorneys, Roy S. McCandless, Esq., PLLC, and with the assent of the Defendants Tophills, Inc. and Escobar, hereby move the court to reissue the summons and to extend the deadline for serving Defendants Febex Moving & Storage (dba Interstate Moving and Storage) and Mikhail Naryshkin (aka Jeff Atwell).

INTRODUCTION

1. The Plaintiffs sent the complaint and summons to the Alameda County Sheriff's office on May 19, 2022, for service on Defendants Febex and Naryshkin. The Sheriff's office received the letter on May 23, 2022, but did not forward it to the division that serves papers until June 20, 2022. That office then returned the documents to Plaintiffs' counsel stating that they could not serve the documents by the deadline in the summons.

2. Plaintiffs respectfully request that the clerk of the court reissue the summons for service on Defendants Febex and Naryshkin and extend the time for service until September 30, 2022.

WHEREFORE, Plaintiffs pray for the following relief:

- A. The Clerk reissue summons for Defendants Febex and Naryshkin., with returns of service filed with this Court by September 30, 2022; and
- B. Grant any further relief the Court deems just and proper.

Respectfully Submitted,

James & Diane Julsonnet

By and through their attorneys,

Roy S. McCandless Esq., PLLC

July 21, 2022

/s/ Roy S. McCandless
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CERTIFICATE OF SERVICE

I hereby certify that this Assented to Motion was served, in accordance with the Court's Administrative Procedures for ECF, on the following persons on this date and in the manner specified herein: Electronically served through ECF to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants, if any:

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/s/ Roy S. McCandless
Roy S. McCandless, Esq.